

The Honorable John H. Chun  
United States District Court Judge

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

Bianey GARCIA PEREZ, Maria  
MARTINEZ CASTRO, J.M.Z., Alexander  
MARTINEZ HERNANDEZ, on behalf of  
themselves as individuals and on behalf of  
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION  
SERVICES; Ur JADDOU, Director, U.S.  
Citizenship and Immigration Services;  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW; David NEAL,  
Director, Executive Office for Immigration  
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &  
STIPULATION**

Note on Calendar: August 14, 2023

**PARTIES' JOINT STATUS REPORT AND STIPULATION**

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services ("USCIS"); Ur Jaddou, Director, USCIS; Executive Office for Immigration Review ("EOIR"); and David L. Neal, Director, EOIR, hereby stipulate to an additional 30-day stay of proceedings as the parties continue to draft a settlement agreement. On May 24, 2023, the parties reached an agreement in principle as to all claims and parties and are working toward finalizing the terms of the settlement agreement.

Plaintiffs and Defendants have previously jointly stipulated to several stays. *See* ECF Nos. 34, 37, 39, 41, 44, 46, 48. Most recently, the parties jointly stipulated to a stay on June 29, 2023. On June 29, 2023, this court granted the parties' stay and ordered the parties to submit a joint status report on August 14, 2023. Since that order, the parties have continued to make progress on finalizing a settlement agreement. On July 27, 2023, Defendants provided Plaintiffs with Defendants' edits to the settlement agreement to Plaintiffs. On August 3, 2023, Plaintiffs provided Defendants with Plaintiffs' feedback to Defendants' edits. Defendants will provide any edits or feedback to the draft settlement agreement by September 8, 2023. Defendants' review has taken longer than anticipated due to the unexpected deployment of USCIS personnel assigned to this case to other matters.

In light of these developments, the parties have agreed to stipulate to a 30-day stay of Defendants' briefing deadlines. Good cause continues to exist for the stipulation because the complexity of the issues in this case requires additional time and there continues to be a meaningful opportunity to reach a settlement that would conserve judicial resources, as well as those of the parties. The parties will file a final settlement agreement with the Court or seek a further extension, if necessary, by September 13, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

For the Plaintiffs:

/s/ Matt Adams

Matt Adams

/s/ Aaron Korthuis

Aaron Korthuis

Northwest Immigrant Rights Project

615 Second Avenue, Suite 400

Seattle, WA 98104

(206) 957-8611

matt@nwirp.org

aaron@nwirp.org

/s/ Mary Kenney

Mary Kenney

/s/ Trina Realmuto

Trina Realmuto

/s/ Kristin Macleod-Ball

Kristin Macleod-Ball

National Immigration Litigation Alliance

10 Griggs Terrace

Brookline, MA 02446

(617) 819-4447

mary@immigrationlitigation.org

trina@immigrationlitigation.org

kristin@immigrationlitigation.org

For the Defendants:

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

U.S. Department of Justice, Civil Division

WILLIAM C. PEACHEY

Director

WILLIAM C. SILVIS

Assistant Director

RUTH CHECKETTS

Special Attorney

/s/ Aneesa Ahmed

Aneesa Ahmed

Trial Attorney

Office of Immigration Litigation

District Court Section

Department of Justice, Civil Division

P.O. Box 868, Ben Franklin Station

Washington, D.C. 20044

(202) 451-7744

Aneesa.Ahmed@usdoj.gov

Dated this 14th day of August, 2023.

STIPULATION - 3  
2:22-cv-00806-JHC

United States Department of Justice, Civil Division  
Office of Immigration Litigation – District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Tel.: (202) 514-2000  
Fax: (202) 305-7000

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 14th day of August.



The Honorable John H. Chun  
UNITED STATES DISTRICT JUDGE